

USAO#2014R00664/EDL

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	HON. Kevin McNulty
	:	
	:	Criminal No. 16- 13
v.	:	
	:	18 U.S.C. § 2261A(2)(B)
BRANDON MCINTYRE	:	18 U.S.C. §§ 2251(a) and (e)
	:	

**INDICTMENT**

The Grand Jury in and for the District of New Jersey, sitting at  
Newark, charges:

**COUNT ONE**  
(Stalking)

From on or about March 22, 2014 through on or about April 7,  
2014, in Monmouth County, in the District of New Jersey, and elsewhere, the  
defendant,

BRANDON MCINTYRE,

with the intent to kill, injure, harass, intimidate, and place under surveillance  
with intent to kill, injure, harass, and intimidate a person in another State,  
namely, Victim 1, used the mail, any interactive computer service or electronic  
communication service or electronic communication system of interstate  
commerce, and any other facility of interstate and foreign commerce, to engage  
in a course of conduct that caused, attempted to cause, and would be  
reasonably expected to cause substantial emotional distress to Victim 1.

In violation of Title 18, United States Code, Section 2261A(2)(B).

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COUNT TWO  
(Production of Child Pornography)

On or about August 11, 2013, in Hunterdon County, the District of New Jersey, and elsewhere, the defendant,

BRANDON MCINTYRE,

did knowingly employ, use, persuade, induce, entice, and coerce, and attempt to employ, use, persuade, induce, entice, and coerce, a minor, namely, Victim 2, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing that such visual depiction would be transported and transmitted using any means and facility of interstate commerce, and which visual depiction was produced and transmitted using materials that were mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and attempted to do so.

In violation of Title 18, United States Code, Sections 2251(a) and (e).

FORFEITURE ALLEGATION

1. The allegations contained in Count Two of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253(a).

2. Upon conviction for violating Title 18, United States Code, Sections 2251(a), defendant,

BRANDON MCINTYRE,


shall forfeit to the United States any and all matter that contains visual depictions of minors engaged in sexually explicit conduct in violation of the offense charged in Count Two; any property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the said violation; and any and all property used or intended to be used in any manner or part to commit and to promote the commission of the aforementioned violation or any property traceable to such property; including, but not limited to, the following property seized from the defendant on or about September 11, 2014:

- a. Hewlett-Packard 635 Laptop, Serial # 5CB1368BGR, with power supply
- b. Black Sprint Motorola Cellular Telephone, ESN # 803156F9;
- c. Black Sprint Motorola Cellular Telephone, ESN # 80190F1E;
- d. Samsung Sprint Cellular Telephone with loose memory card, HEX # A000002343CE43;

e. Motorola Droid Razr Cellular Telephone, Model XT912.

A TRUE BILL

\_\_\_\_\_  
FOREPERSON

  
\_\_\_\_\_  
PAUL J. FISHMAN  
United States Attorney

CASE NUMBER: 15-16-13

**United States District Court  
District of New Jersey**

**UNITED STATES OF AMERICA**

**v.**

**BRANDON MCINTYRE**

**INDICTMENT FOR**

**18 U.S.C. § 2261A(2)(B)  
18 U.S.C. §§ 2251(a) and (e)**

**A True Bill,  
Foreperson**

**PAUL J. FISHMAN  
UNITED STATES ATTORNEY  
NEWARK, NEW JERSEY**

**ERICA LIU  
SPECIAL ASSISTANT U.S. ATTORNEY  
973-645-3989**